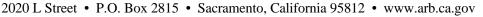


Secretary for Environmental Protection

Air Resources Board

Alan C. Lloyd, Ph.D. Chairman





March 10, 1999

Dear Sir or Madam:

Enclosed for your review and comment is a draft summary of the results of our 1997 Consumer and Commercial Products Survey (Survey). This draft summary table and the previously released data summaries will be discussed at a public workshop on March 18, 1999, in El Monte, California. Notice of the public workshop was sent to you under separate cover. Please note the draft summary table includes products that were reported after we released the draft data summaries. The draft data summaries are currently available on the Internet at http://www.arb.ca.gov/consprod/regact/ccps/ccps.htm.

The draft summary table includes the following information in tons per day by category: 1) the reported product sales; 2) the adjusted product sales to reflect complete market coverage; and 3) the corresponding adjusted values for total Volatile Organic Compounds (VOC); Low Vapor Pressure VOC's (LVP); parachlorobenzotrifluoride (PCBTF), methylene chloride (MeCl), 1,1,1-trichloroethane (TCA), volatile methyl siloxanes (VMS), acetone, carbon dioxide (CO2), hydrofluorocarbon 152a (HFC152a), water (H2O) and perchloroethylene (PERC).

The adjustment factors are not listed by category, but can be calculated by dividing the adjusted sales by the reported sales. In all but eight categories, we assumed a 90 percent market coverage. For the remaining eight categories, the adjusted sales are shown in bold print. The rationale for further adjusting the reported sales in eight categories is as follows:

- Mid-term Measures Categories The market coverage appears to be low for the Bug and Tar Remover, Floor Wax Stripper, Non-Selective Herbicides/Defoliants and Undercoating categories. Therefore, the sales adjustments for these categories are consistent with those used during the Mid-term Measures effort.
- Automotive Windshield Washer Fluids The market coverage for this category is low because many small, local or regional companies are not on our Survey mailing list. Shelf surveys revealed that most of the products on the shelves are not reported in our Survey.
 The estimate was developed with assistance from the American Automobile Association, and is consistent with our previous estimate for this category.
- Paint Removers or Strippers Several of the largest manufacturers of these products have not yet submitted a completed Survey. This sales estimate is based upon discussions with these manufacturers.

Sir or Madam

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- Engine Degreasers This adjustment factor was developed by performing numerous shelf surveys at auto parts stores and comparing the shelf space of reported products to that of non-reported products. This technique for estimating market coverage has been suggested by members of the consumer products industry.
- Charcoal Lighter Materials Due to low market coverage, this estimate is consistent with our previous estimate for this category.

Please provide us your comments on the draft summary table by April 10, 1999. You may provide your comments by e-mail or in writing at the following addresses:

E-Mail: djulian@arb.ca.gov

Written Comments: California Air Resources Board

Stationary Source Division

2020 L Street

Sacramento, CA 95814

Attn: Measures Development Section

For questions regarding the draft summary table or the upcoming workshop, please call Ms. Barbara Fry, Manager, Measures Development Section, at (916) 322-8267, or Mr. Dave Julian, Measures Development Section, at (916) 323-1519. Thank you for your assistance in this effort.

Sincerely,

Genevieve A. Shiroma, Chief Air Quality Measures Branch

Enclosure

cc: See next page.

Sir or Madam

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cc: Ms. Barbara Fry
Manager, Measures Development Section
Stationary Source Division

Mr. Dave Julian Measures Development Section Stationary Source Division